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UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA – PHILADELPHIA DIVISION

In re:

JOHN WEI F/K/A WEI XIANG YONG, : Case No. 23-13678-AMC

Chapter 11

Debtor.

eotor.

SUPPLEMENTAL BRIEF IN FURTHER SUPPORT OF MOTION OF SHIN DA ENTERPRISES INC., 446-50 N. 6th ST. LLC, AND LIJIAN REN TO DISMISS THE CHAPTER 11 BANKRUPTCY PETITION OR, IN THE ALTERNATIVE, FOR THE APPOINTMENT OF A CHAPTER 11 TRUSTEE

- 1. On September 12, 2024, Shin Da Enterprises Inc., 446-50 N. 6th St. LLC, and Lijian Ren ("Movants") filed a Motion to Dismiss the Chapter 11 Bankruptcy Petition or, in the Alternative, for the Appointment of a Chapter 11 Trustee.
- 2. At the time that motion was filed, Debtor's 2023 Personal Financial Statement was not available. On September 16, 2024, Movants' counsel received that document in response to a document subpoena directed to Asian Bank. **See Exhibit A.**
- 3. Generally, Debtor's Personal Financial Statement, signed October 4, 2023 reports significantly higher asset values and ownership interests than those reported on Debtor's Petition for Bankruptcy filed two months later, on December 4, 2024.
- 4. Specifically, in his Personal Financial Statement, Debtor reports having total assets of \$122,523,450, with a net worth of \$55,790,812 with \$4,488,884 cash on hand.
- 5. Additionally, Debtor continues to frustrate discovery efforts ongoing within the Bankruptcy proceeding, and in the RICO Action.
- 6. In the adversary proceeding captioned *Wei v. Shin Da Enterprises et. al.* (Case No. 23-13678-AMC Adv.), Movants served discovery requests seeking disclosure of Debtor's assets.

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7. Following a Motion to Quash filed by Debtor that significantly delayed those

disclosures, the Court ordered Debtor to provide his discovery responses by September 6, 2024.

That order is attached as **Exhibit B**. To date, Debtor has not provided any responses or documents.

8. Additionally, in the RICO Action, Movants served a subpoena on three entities

controlled by Debtor, Independence Press Master Tenant, LLC, Independence Press Building MT

Managing Member, LLC, and Independence Press Building Management Company.

9. These entities all relate to, and control the cashflow for, PA Ridge Associates, which

Debtor valued at \$41,300,000 on his 2023 Personal Financial Statement. See Ex. A at p. 4.

10. These entities failed to respond to the subpoenas, leading to a Rule to Show Cause

Hearing on September 17, 2024 before the Honorable Chad F. Kenney.

11. By order following that hearing, Judge Kenney continued the hearing until October

2, 2024, where these entities will be required to show cause why they should not be held in

contempt of court and sanctioned. That that order is attached hereto as Exhibit C.

12. Movants respectfully request that the Court consider this supplemental filing as an

attachment to its Motion to Dismiss Debtor's Bankruptcy Petition, or, in the Alternative, for the

Appointment of a Chapter 11 Trustee.

Respectfully submitted,

KANG HAGGERTY LLC

By: /s Kyle Garabedian

Edward T. Kang

Daniel Haggerty

Kyle Garabedian

Gregory H. Mathews

123 S. Broad Street, Suite 1950

Philadelphia, PA 19109

Tel: (215) 525-5850

kgarabedian@kanghaggerty.com

Attorneys for Movants

Dated: September 19, 2024

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA – PHILADELPHIA DIVISION

In re:

JOHN WEI F/K/A WEI XIANG YONG,

Case No. 23-13678-MDC

Chapter 11

Debtor.

:

CERTIFICATE OF SERVICE

I, Kyle Garabedian, hereby certify that on September 9, 2024, I caused a true and correct copy of the foregoing Motion to Dismiss the Chapter 11 Bankruptcy Petition or, in the Alternative, for the Appointment of a Chapter 11 Trustee to be served electronically via CM/ECF and via electronic mail as follows:

John Wei (f/k/a Wei Xiang Yong), Chapter 11 Debtor 525 N. 11th Street, Suite 101 Philadelphia, PA 19123

Frank M. Correll Jr., Esquire Christopher John Leavell, Esquire Klehr Harrison Harvey Branzburg LLP 1835 Market Street, Suite 1400 Philadelphia, PA 19103 fcorrell@klehr.com cleavell@klehr.com

David L. Braverman, Esquire Braverman Kaskey Garber, P.C. One Liberty Place 1650 Market Steet, Floor 56 Philadelphia, PA 19103 dbraver@braverlaw.com

Albert A. Ciardi III, Esquire Daniel S. Siedman, Esquire Ciardi Ciardi and Astin 1905 Spruce Street Philadelphia, PA 19103 aciardi@ciardilaw.com dsiedman@ciardilaw.com Holly Smith Miller, Esquire (Trustee) Gellert Scali Busenkell & Brown LLC 8 Penn Center 1628 John F. Kennedy Blvd., Suite 1901 Philadelphia, PA 19103 hsmiller@gsbblaw.com

United States Trustee Office of United States Trustee Robert N.C. Nix Federal Building 900 Market Street, Suite 320 Philadelphia, PA 19107 USTPRegion03.PH.ECF@usdoj.gov

Kevin P. Callahan, Esquire Department of Justice Robert N.C. Nix Federal Building 900 Market Street, Suite 320 Philadelphia, PA 19107 kevin.p.callahan@usdoj.gov

Louis I. Lipsky, Esquire Rachel I. Freedman, Esquire Lipsky and Brandt 1101 Market Street, Suite 2820 Philadelphia, PA 19107 LLipsky@lipskybrandt.com rfreedman@lipskybrandt.com

Mario Hanyon, Esquire Brock and Scott, PLLC 302 Fellowship Road, Suite 130 Mount Laurel, NJ 08054 wbecf@brockandscott.com

Daniel C. Kerrick, Esquire Garvan F. McDaniel, Esquire Hogan McDaniel 1311 Delaware Avenue Wilmington, DE 19806 dckerrick@dkhogan.com gfmcdaniel@dkhogan.com Denise Elizabeth Carlon, Esquire KML Law Group, P.C. 701 Market Street Suite 5000 Philadelphia, PA 19106 dcarlon@kmllawgroup.com

Mark A. Cronin, Esquire Law Office of Mark A. Cronin 128 Hillside Road Wayne, PA 19087 philalaw@aol.com

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Isabella H. Gray, Esquire Klehr Harrison Harvey Branzburg, LLP 1835 Market Street Philadelphia, PA 19103 igray@klehr.com

Robert H. Holber, Esquire Attorney Robert H. Holber PC 41 East Front Street Media, PA 19063 rholber@holber.com

Joshua B. Ladov, Esquire Ladov Law Firm, P.C. 1101 Market Street Suite 2820 Philadelphia, PA 19107-2993 jladov@ladovlaw.com

Michelle L. McGowan, Esquire Robertson, Anschutz, Schneid, Crane & Partners PLLC 13010 Morris Road Suite 450 Alpharetta, GA 30004 mimcgowan@raslg.com Laurence A. Mester, Esquire Mester & Schwartz, P.C. 1917 Brown Street Philadelphia, PA 19130 Imester@mesterschwartz.com

Christopher R. Momjian, Esquire Office of the Attorney General 1600 Arch Street 3rd Floor Philadelphia, PA 19103 crmomjian@attorneygeneral.gov

Andrew L. Spivack, Esquire Brock & Scott, PLLC 302 Fellowship Road Suite 30 Mount Laurel, NJ 08054 Andrew.spivack@brockandscott.com

Stephen R. Starks, Esquire Brock & Scott PLLC 3825 Forrestgate Dr. Winston-Salem, NC 27103 ryan.starks@brockandscott.com

Pamela Elchert Thurmond, Esquire City of Philadelphia Law/Revenue Department, Municipal Services Building 1401 John F. Kennedy Boulevard, 5th Floor Philadelphia, PA 19102 pamela.thurmond@phila.gov

> <u>/s/ Kyle Garabedian</u> Kyle Garabedian

EXHIBIT A

| Section 1 - | ndividual Information | | Section 2 - | Other Party Information | | | | |
|--|-----------------------|----------------------|------------------------|-------------------------|----------------------|--|--|--|
| Name John Wei | | | Name Jan Me | i He. | | | | |
| Address 525 N 11th St, Unit 101 | | | Address | | | | | |
| City, State, & Zip Philadelp | nia, PA 19123 | | City, State, & Zip | | | | | |
| Position or Occupation President & CEO | | | Position or Occupation | | | | | |
| Business Name United D | velopment LLC | | Business Name | | | | | |
| Business Address 525 N 11 | h St, Unit 101 | | Business Address | | | | | |
| City, State & Zip Philadelp | nia, PA 19123 | | City, State & Zip | | | | | |
| Length of Employment 21+ years | | | Length of Employment | | | | | |
| Bus. Phone (267) 250-1210 | Bss. Phone | (267) 880-9288 | Bus. Phone | Bss. Phone | | | | |
| Other Phone (267) 918-1760 | 😾 U.S. Citizen | ☐ Permanent Resident | Other Phone | ∐ U.S. Citizen | ☐ Permanent Resident | | | |

| Section 3 - Statement of Financial Condition as of: | | | | Sept | tember-2023 |
|--|-----|-----------------------|--|------|----------------------------|
| Assets (Do not include assets of doubtful value) | | dollars nit cents) | Liabilities | | In dollars (omit cents) |
| | (6) | int conta) | Notes payable to banks - see Schedule G | \$ | 2,064,00 |
| Cash on hand and in Bank - see Schedule A | \$ | 2,118,592 | Notes Due Partnerships - see Schedule J | \$ | _, |
| Cash on hand and in Bank - see Schedule B | \$ | 2,370,292 | Due to Brokers | \$ | |
| U.S. Gov't & marketable securities - see Schedule C | \$ | - | Amounts payable to others - secured | \$ | |
| Non - marketable securities - see Schedule D | \$ | - | Amounts payable to others - unsecured | \$ | |
| Securities held by broker in margin accounts | \$ | - | Accounts and bills due | \$ | |
| Restricted, control or margin account stocks | \$ | - | Automobiles Loan | \$ | - |
| Real Estate owned - see Schedule E | \$ | 117,904,000 | Unpaid income tax | \$ | , |
| Accounts, loans, and notes receivable | \$ | 3 | Other unpaid taxes and interest | \$ | |
| Automobiles (Present Value) | \$ | 63,000 | Real Estate mortgages payable - see Schedule E | \$ | 64,668,639 |
| Other personal property | \$ | - | Other debts (car payments, credit cards, etc.) - itemize | \$ | |
| Cash surrender value - life insurance - see Schedule F | \$ | 67,566 | Credit Card | \$ | |
| Partnerships -see Schedule H | \$ | 9.1 | Life Insurance Loans- see Schedule F | \$ | |
| Other assets-itemize - see Schedule I | \$ | - | Estimate Tax if Properties are Sold | \$ | |
| | | | Total Liabilities | \$ | 66,732,639 |
| | | | Total Net Worth | \$ | 55,790,812 |
| Total Assets | \$ | 122,523,450 | Total Liabilities and Net Worth | \$ | 122,523,450 |
| PERSONAL INFORMATION | YES | NO | ACCOUNTANT | | |
| Do you have a will? | Х | | Name: | | |
| If so, name executor: | | | Address: Phone: | | |
| Have you ever declared bankruptcy? | | х | Priorie: | | |
| If so, describe: | | | ATTORNEY | | |
| 90 | | | Name: | | |
| Have you ever been audited by the IRS? | | х | Address: | | |
| If so, describe: | | | Phone: | | |

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Wei

| Section 4-Annual in For Year Ended 2 | | Annual Expenditures | | Contingent Liabilities | | | Estimated Amounts |
|---|-----------------|--|---------------|--|---|----|----------------------|
| Salary | \$ 249,186 | Mortgage/rental payments | \$ 14,400 | Do you have any | Yes | No | |
| Bonus & commissions | \$ - | Real Estate taxes & assessments | \$ - | Contingent liabilities | X | | |
| Dividends & interest | \$ 3,525 | Taxes - federal, state & local | \$ 58,922 | legal actions? | | Х | |
| Real Estate income | \$ 978,749 | Insurance payments | \$ 51,500 | Other special debt or circumstances Contested income tax | | Χ | |
| Tax Free Income | \$ - | Other contract payments (car payments, charge cards, etc.) | \$ 158,243 | | | Х | |
| Other Income | \$ - | Alimony, child support, maintenance | \$ | If "yes" to any question(s) desc | ribe: | | |
| (allmony, child support, or separate maintenance income need not be revealed if you do not wish to have it considered as a basis for repaying this obligation.) | | Other expenses Property Maintenance Fee | \$ _ | | T 7 2 2 1 1 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 | | |
| Total Income | \$ 1,231,460 | Total Expenditures | \$ 283,065 | Total Contingent Liabilities | | | \$ - |

SCHEDULE A - CASH AND CERTIFICATE OF DEPOSIT IN OTHER BANKS

| Description | Name of Institution | In Name of | Are these Pledged or Held by others? | Value |
|------------------|-----------------------|------------------------|--------------------------------------|-------------|
| Money Market CD | Victory Bank | John Wei | No | \$ 2,000,00 |
| Checking Account | HSBC Bank | John Wei | No | \$ 19,63 |
| Checking Account | Citizens Bank | John Wei & Jian-Mei He | Yes | \$ 11,31 |
| Checking Account | The Bank of Princeton | John Wei & Jian-Mei He | Yes | \$ 33,93 |
| Checking Account | TD Bank | John Wei & Jian-Mei He | Yes | \$ 46,56 |
| Checking Account | Victory Bank | John Wei & Jian-Mei He | Yes | \$ 7,14 |
| | | | | |

SCHEDULE B - CASH AND CERTIFICATE OF DEPOSIT IN OTHER BANKS

| Description | Name of Institution | In Name of | Are these Pledged or Held by others? | Value | |
|------------------------------------|---------------------|--|--------------------------------------|---------------|--|
| Checking Account & Reserve Account | Parke Bank | 500 Loft LLC | No | \$ 257,571 | |
| Checking Account | Parke Bank | 1028 Arch LP | No | \$ 38,405 | |
| Interest Reserve | Parke Bank | 1028 Arch LP | No | \$ 100,000 | |
| Checking Account | Parke Bank | AJ Fortune LLC | No | \$ 174 | |
| Checking Account | Asian Bank | Hunting Park Investment LLC | No | \$ 7,116 | |
| Checking Account | Parke Bank | Independent Press Building Management | No | \$ 97,668 | |
| Checking Account | Citizens Bank | Independent Press Building Master Tenant | No | \$ 8,543 | |
| Checking Account | Parke Bank | Independent Press Building Master Tenant | No | \$ 48,295 | |

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| Description | Name of Institution | In Name of | Are these Pledged or Held by others? | Value |
|-----------------------------|-------------------------------|--|--------------------------------------|---------------|
| Checking Account | TD Bank | JM Capital US LLC | No | \$ 15,176 |
| Checking Account | TD Bank | JM Investment US LP | No | \$ 185,625 |
| Checking Account | First Citizens Community Bank | Lancaster Pride Realty LP | No | \$ 72,202 |
| Checking Account | Parke Bank | MJ Central Investment LP | No | \$ 60,260 |
| Checking Account | Parke Bank | PA Ridge Associates LP | No | \$ 78,600 |
| Checking Account | PNC Bank | PA Ridge Associates LP | No | \$ 860,000 |
| Checking Account | Citizens Bank | Spring Garden Marketing & Investment LLC | No | \$ 20,166 |
| Checking Account | Citizens Bank | UIG Construction LLC | No | \$ 70,996 |
| Checking Account | Parke Bank | Vine International Investments LP | No | \$ 100,000 |
| Checking Account | Citizens Bank | Wei's Properties Inc. | No | \$ 88,617 |
| Checking Account | Parke Bank | AJ Land LLC | Yes (56%) | \$ 21,694 |
| Checking Account -Misc Hold | Parke Bank | AJ Land LLC | Yes (56%) | \$ 20,000 |
| Checking Account | TD Bank | City Hotel Group Inc. | Yes (64%) | \$ 142,227 |
| Checking Account | Citizens Bank | United Associates LP | Yes (64%) | \$ 6,560 |
| Checking Account | Citizens Bank | E-Town Development LP | Yes (50%) | \$ 8,383 |
| Checking Account | WSFS Bank | E-Town Development LP | Yes (50%) | \$ 8,134 |
| Checking Account | Parke Bank | Gree HVAC US LLC | Yes (50%) | \$ 1,733 |
| Checking Account | Citizens Bank | JD Living USA LLC | Yes (50%) | \$ 41,577 |
| Checking Account | Parke Bank | UD Realty LLC | Yes (50%) | \$ 495 |
| Checking Account | Parke Bank | United Investment Group LP | Yes (44%) | \$ 10,076 |

SCHEDULE C - U.S. GOVERNMENT & MARKETABLE SECURITIES

| Number of Shares or Face Value of Bonds | Description | In Name of | Are the Registered Pledged or Held by others? | С | ost | Market Value | | |
|--|-------------|------------|--|----|-----|--------------|---|--|
| | | | | \$ | - | \$ | | |
| | | | | \$ | - | \$ | - | |
| | | | | \$ | - | \$ | - | |

SCHEDULE D - NON - MARKETABLE SECURITIES

| Number of Shares | Description | Are the Register In Name of Pledged or Held by | | Original Investment | Current Value | | Source of Value |
|------------------|-------------|--|--|------------------------|---------------|---|-----------------|
| | | | | \$ | - \$ | - | |
| | | | | \$ | - \$ | - | |
| | | | | \$ | - \$ | - | |

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| SCH | EDULE E - RESIDENCE AND O | THER REAL | ESTA | TE (PARTI | | OLLY O | WNED) | | r | |
|---|---|-----------|------|---------------|-----------------------------|-------------|-----------|-----------------|---------------------------|----------------------------------|
| | | % of | | onthly Rental | * Other | # 3.50 ales | at Maluo | onthly yment | * Contingent Liability | l sadas |
| Address and Type of Property | Title in Name of | Ownership | | Income | Expenses All * are calcula | | et Value | | Liability | Lender |
| 411-419 N. 9th St Phila Comm. Building of 59,000 sq. ft. & Comm. parking lot | 500 Loft LLC | 100% | \$ | 44,500 | | | 0,000,000 | 28,014 | \$ 4,203,563 | Parke Bank |
| 1026 Arch St., 1028 Arch St., Phila Mixed Use Comm. & (#) Apt. | 1028 Arch LP | 100% | \$ | 45,500 | \$ 4,750 | \$ 7 | ,500,000 | \$ 38,205 | \$ 4,124,524 | Parke Bank |
| 541-543 Washington Ave & 1043 S 6th St Phila Mixed Use Comm. & (#) Apt. | C. C. Loft Associates LLC | 100% | \$ | 5,500 | \$ 1,560 | \$ | 950,000 | \$ 3,281 | \$ 378,130 | Parke Bank |
| 7037 N Broad St Phila (Lot 22,000 sf Building 13,332 sf) | Hunting Park Investment LLC | 100% | \$ | 11,000 | \$ 980 | \$ 1 | ,500,000 | \$ 3,791 | \$ 587,531 | Asian Bank |
| 915 Route 73 Mt. Laurel NJ (279 Hotel Rooms, 500 parking lot & water park) Total 619,166 Sq Ft | JM Investment US LP | 100% | \$ | 265,000 | \$ 65,000 | \$ 21 | ,000,000 | \$ 120,000 | \$ 10,700,000 | JP Financial LLC |
| 901 N. Penn St Phila F1307 Waterfront Condo. | John Wei & Jlan M. He | 100% | \$ | 2,150 | \$ 421 | \$ | 325,000 | \$ 1,578 | \$ 123,388 | Wells Fargo |
| 4800 Lancaster Pike Wilmington DE 127 Beds & 74 Units Independent Senior Living in Progress | Lancaster Pride Realty LP | 100% | \$ | 28,500 | \$ 5,300 | \$ 7 | ,850,000 | \$ 20,169 | \$ 4,246,000 | First Citizens Community Bank |
| 1123-32 Spring Garden St. Philla (Hotel 43 Rooms) 1135 Spring Garden St. (Mixed Use 1122-32 Brandywine St. Comm. & Apt.) | MJ Central Investment LP | 100% | \$ | 34,300 | \$ 1,750 | \$ 7 | ,500,000 | \$ 23,333 | \$ 3,500,000 | JP Financial LLC |
| 525 N. 11th St Phila Mixed 8 Comm. Units, & 92 Apis. & 92 Parking Spots | PA Ridge Associates LP | 100% | \$ | 268,370 | \$ 18,303 | \$ 41 | ,300,000 | \$ 145,692 | \$ 27,952,807 | PNC Bank |
| 142-144 N. Broad St Phila Mixed Use Comm. Parking Lot in Progress | Spring Garden Marketing & Investment LLC | 100% | \$ | - | \$ 7,500 | \$ | 9,000,000 | \$ 25,000 | \$ 3,500,000 | JP Vision Financia LLC |
| 1023 Vine St Phila 1 Comm. Parking lot | Vine International Investment LP | 100% | \$ | 36,000 | \$ 1,500 | \$. | 5,000,000 | \$ 18,674 | \$ 2,635,698 | Parke Bank |
| 1019-23 Appletree St. Phila Mixed Use Comm. & Apt. | United Associates LP | 64% | \$ | 3,500 | \$ 105 | \$ | 704,000 | \$ 1,714 | \$ 100,022 | See Schedule-G |
| 1020-26 Cherry St Phila (1 Restaurant commercial, 42 key hotel rooms & parking lot) | AJ Land LLC | 56% | \$ | 27,216 | \$ 853 | \$: | 5,000,000 | \$ 22,342 | \$ 2,423,310 | Parke Bank |
| 1702 S. 4th St. Phila Single Family | John Wel (Luk H. Wing) | 50% | \$ | 1,600 | \$ 165 | \$ | 160,000 | \$ 777 | \$ 18,187 | Nation Star |
| 1719 S. 8th St. Phila Multi Unit 3 Apts. | E-Town Development LP | 50% | \$ | 2,250 | \$ 210 | \$ | 175,000 | \$ - | \$ - | N/A |
| 347 Unruh Ave. Phila Single Family | John Wel (Luk H. Wing) | 50% | \$ | 1,200 | \$ 92 | \$ | 130,000 | \$ - | \$ - | N/A |
| 426 Morris St. Phila Multi Unit | John Wel (Luk H. Wing) | 50% | \$ | 1,500 | \$ 180 | \$ | 150,000 | \$ - | \$ - | N/A |
| 117 N. 11th St. Phila Comm, Public Parking Lot | United Investments Group LP | 44% | \$ | 5,000 | \$ 450 | \$ | 660,000 | \$ 2,114 | \$ 175,478 | Parke Bank |

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SCHEDULE F - LIFE INSURANCE CARRIED, INCLUDING GROUP INSURANCE

| Name of Insurance Company | Owner of Policy | Beneficiary and Relationship | Face Amount | Policy Loans | Cash Surrender Value |
|--|-----------------|---|--------------|--------------|----------------------|
| MassMutual | Ying Wel | John Wel (Son) Jian-Mei He (inław) | \$ 2,000,000 | \$ - | \$ 58,358 |
| MassMutual | Jian-Mel He | John Wei (Husband) Mila & Hailey Wei (Daughters) | \$ 3,000,000 | \$ - | - |
| Transamerica Premier Life Insurance Company | John Wel | Jian-Mei He (Wife) | \$ 500,000 | \$ - | \$ 9,208 |

SCHEDULE G - BANK AND OTHER INSTITUTIONAL RELATIONSHIPS

| Name and Address of Creditor | Cr | edit Line Amount | Date of Loan | Maturity Date | Unsecured or Secured (List Collateral) | Monthly ayment | Amount Owed |
|------------------------------|----|------------------|--------------|---------------|---|-------------------|--------------|
| Bala Resources LLC | \$ | 2,000,000 | 9/1/2022 | 8/31/2025 | Line of Credit | \$ 13,333 | \$ 2,000,000 |
| Kilau Lee & Jing Chu | \$ | 224,000 | 2/6/2014 | 2/28/2029 | 1019-23 Appletree St. Mixed Use Comm. & 2 Apt. | \$ 1,714 | \$ 100,022 |
| HSBC Bank | \$ | 80,000 | 5/1/2022 | N/A | Line of Credit for Wei's Properties Inc. | \$ 1,005 | \$ 64,000 |

SCHEDULE H - PARTNERSHIPS

| Type of Investment | Date Initial Investment | Market Value | Percent Owned | Current Market Value (Of Your ownership Interest) | Balance Due on Partnership: Notes, Cash call | Final Contribution Date |
|--------------------|----------------------------|--------------|---------------|---|---|----------------------------|
| | | | | , | | |
| | | | | | | |

SCHEDULE I - BUSINESS VENTURES AND OTHER ASSETS

| List Name and Address of Any Business Venture in Which You | | | Your % of | | Total Assets of | | |
|--|------------------------|-----------|-----------|---------------------------------------|-----------------|------------------|-------------------|
| are an Owner, Stockholder, or Partner | Total Assets Listed in | Section 3 | Ownership | Your Position / Title In the Business | Business | Line of Business | Years in Business |
| City Hotel Group Inc. D.B.A. Sleep Inn. | \$ | 320,000 | 64% | President | \$ 500,000 | Hospitality | 9 |
| | | | | | | | |
| | | | | | | | |

EXHIBIT B

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| IN RE: | : CHAPTER 11 |
|---|--|
| JOHN WEI (f/k/a WEI XIANG YONG) Debtor. | : Case No. 23-13678-AMC Adv. : Pro. No. 24-00055-AMC |
| JOHN WEI (f/k/a WEI XIANG YONG) Plaintiff, | : : : : |
| V. | : |
| SHIN DA ENTERPRISES, INC. 446-50 N. 6 TH STREET, LLC; AND LIJIAN REN | |
| Defendants. | |

ORDER

AND NOW, this 5th day of Sept. ___, 2024, upon consideration of Motion of the Plaintiff to Quash the Subpoenas Issued by Defendants and the Request for Documents Directed to the Debtor/Plaintiff (ECF Doc. No. 11) (the "Motion to Quash"), and Defendants' response in opposition thereto, and after oral argument on the Motion to Quash, it is hereby **ORDERED** that Plaintiff's Motion to Quash is **GRANTED IN PART AND DENIED IN PART. IT IS FURTHER ORDERED** that:

- 1. Plaintiff shall respond to Defendants' Request for Documents, without objection other than to privilege, by September 6, 2024, except that the timeframe for the requested documents shall be from January 1, 2023 to present; and
- 2. The Motion to Quash is denied as to all subpoenas issued by Defendants; and
- 3. All case management deadlines are extended by ninety (90) days.

BY THE COURT:

J.

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHIN DA ENTERPRISES INC., et al., : CIVIL ACTION

Plaintiffs,

:

v. :

:

WEI XIANG YONG, et al.,

Defendants. : NO. 21-cv-03384

ORDER

AND NOW, this 17th day of September 2024, following the hearing held earlier today requiring Independence Press Building MT Managing Member, LLC, Independence Press Building Master Tenant LLC, and Independence Press Building Management Company (collectively, "Respondents") to show cause before this Court pursuant to the Order to Show Cause (ECF No. 371), it is hereby ORDERED that the Order to Show Cause (ECF No. 371) is CONTINUED to October 2, 2024, at 9 a.m.

Respondents are **ORDERED** to show cause before this Court, in Courtroom 11B of the United States District Court for the Eastern District of Pennsylvania at 601 Market Street, Philadelphia, PA 19106, on **October 2, 2024, at 9 a.m.**: (1) why Respondents should not be sanctioned for failing to comply with this Court's July 31, 2024 Order (ECF No. 358); (2) why Respondents should not be held in contempt of the July 31, 2024 Order (ECF No. 358); (3) why Respondents should not be required to pay daily fines to the court; (4) why Respondents should not be required to compensate Plaintiffs for their attorneys' fees in connection with bringing Respondents into compliance with the Subpoena (*see* ECF No. 367-3); and (5) why this Court should not grant any other and further relief that this Court deems just and equitable.

It is further **ORDERED** that the parties shall file a joint status report by **12:00 p.m. September 27, 2024**. The Parties must meet and confer prior to filing the report.

BY THE COURT:

/s/ Chad F. Kenney

CHAD F. KENNEY, JUDGE